

## EXHIBIT H

**HUGHES HUBBARD & REED LLP**

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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
(Trenton)**

HIS ALL HOLINESS,  
BARTHOLOMEW I, THE  
ARCHBISHOP OF  
CONSTANTINOPLE, NEW ROME,  
AND ECUMENICAL PATRIARCH;  
THE HOLY METROPOLIS OF  
DRAMA; and THE MONASTERY OF  
THEOTOKOS EIKOSIPHONISSA,

Plaintiffs,

vs.

PRINCETON UNIVERSITY,

Defendant.

Case No. 3:18-CV-17195-MAS-DEA

The Hon. Judge Michael A. Shipp

**PLAINTIFFS' OBJECTIONS AND  
RESPONSES TO DEFENDANT'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION**

TO:

Linda Wong, Esq.

WONG FLEMING

821 Alexander Road

Suite 200

Princeton, NJ 08540

*Counsel for Defendant Princeton University.*

**OBJECTIONS AND RESPONSES TO REQUESTS FOR DOCUMENTS  
TO BE PRODUCED**

**REQUEST NO. 1**

Produce all documents and communications that regard or relate to your efforts, or efforts made on your behalf, to locate the Manuscripts after March 27, 1917, including, but not limited to, all documents, communications, and research generated in connection with those efforts.

**RESPONSE:**

The Patriarchate objects to this request on several grounds. First, the Patriarchate objects to the extent the request seeks materials that are not in the Patriarchate's possession, custody or control. Fed. R. Civ. P. 34(a)(1). Second, the Patriarchate objects to this request to the extent that it seeks communications protected by the attorney-client communications privilege and the attorney-work product privilege. Third, the Patriarchate objects to this request to the extent that Princeton's definition of "your" includes parties and individuals over whom the Patriarchate has no control. Fourth, the Patriarchate objects to this request to the extent that Princeton's definition of "communication" is overly broad and imposes obligations beyond those contained in the Federal Rules of Civil Procedure Local Rules of this Court. The Patriarchate is unaware of whether any documents responsive to this request exist. To the extent they do and subject to and without waiving these objections, the Patriarchate responds that it will produce responsive documents and communications identified after a reasonable search.

**REQUEST NO. 2**

Produce all documents and communications that regard or relate to your efforts, or efforts made on your behalf, to obtain possession of manuscripts allegedly stolen on March 27, 1917 from the Monastery.

**REQUEST NO. 13**

Produce all documents and communications that regard or relate to Robert Garret's possession of any Manuscript, and your knowledge of such possession.

**RESPONSE:**

The Patriarchate objects to this request on several grounds. First, the Patriarchate objects to the extent the request seeks materials that are not in the Patriarchate's possession, custody or control. Fed. R. Civ. P. 34(a)(1). Second, the Patriarchate objects to this request to the extent that it seeks communications protected by the attorney-client communications privilege and the attorney-work product privilege. Third, the Patriarchate objects to this request to the extent that Princeton's definition of "your" includes parties and individuals over whom the Patriarchate has no control. Fourth, the Patriarchate objects to this request to the extent that Princeton's definition of "communication" is overly broad and imposes obligations beyond those contained in the Federal Rules of Civil Procedure Local Rules of this Court. The Patriarchate is unaware of whether any documents responsive to this request exist. To the extent they do and subject to and without waiving these objections, the Patriarchate responds that it will produce responsive documents and communications identified after a reasonable search.

**REQUEST NO. 14**

Produce all documents and communications that regard or relate to Defendant's possession of any Manuscript, and your knowledge of such possession.

**RESPONSE:**

The Patriarchate objects to this request on several grounds. First, the Patriarchate objects to the extent the request seeks materials that are not in the Patriarchate's possession, custody or

control. Fed. R. Civ. P. 34(a)(1). Second, the Patriarchate objects to this request to the extent that it seeks communications protected by the attorney-client communications privilege and the attorney-work product privilege. Third, the Patriarchate objects to this request to the extent that Princeton's definition of "your" includes parties and individuals over whom the Patriarchate has no control. Fourth, the Patriarchate objects to this request to the extent that Princeton's definition of "communication" is overly broad and imposes obligations beyond those contained in the Federal Rules of Civil Procedure Local Rules of this Court. The Patriarchate is unaware of whether any documents responsive to this request exist. To the extent they do and subject to and without waiving these objections, the Patriarchate responds that it will produce responsive documents and communications identified after a reasonable search.

#### **REQUEST NO. 15**

Produce all documents and communications that regard or relate to your knowledge of any manuscripts, including the Manuscripts, being allegedly stolen on March 27, 1917 from the Monastery.

#### **RESPONSE:**

The Patriarchate objects to this request on several grounds. First, the Patriarchate objects to the extent the request seeks materials that are not in the Patriarchate's possession, custody or control. Fed. R. Civ. P. 34(a)(1). Second, the Patriarchate objects to this request to the extent that it seeks communications protected by the attorney-client communications privilege and the attorney-work product privilege. Third, the Patriarchate objects to this request to the extent that Princeton's definition of "your" includes parties and individuals over whom the Patriarchate has